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2	District of Nevada		
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7	Attorneys for Defendant		
8	LINITED COLATO		
9	UNITED STATES DISTRICT COURT		
9	DISTRICT OF NEVADA		
10			
10	WANDA R. CLEMONS, )		
11	WANDA R. CLEMONS,	) )	
• •	Plaintiff,	) )	
12	Traineri,	)	
	v.	)	
13		Case No.: 2:15-cv-00389-APG-VCF	
	CAROLYN W. COLVIN,		
14	Acting Commissioner of Social Security,		
15	Defendant.		
16			
	INCORPOGED MOTION		
17	UNOPPOSED MOTION FOR EXTENSION OF TIME		
18	(First Requ	(First Request by Defendant)	
10	COMES NOW Defendant Carolyn W. (	Colvin Acting Commissioner of Social Security	
19	COMES NOW Defendant Carolyn W. Colvin, Acting Commissioner of Social Security		
19	(Defendant), by and through her counsel, Daniel G. Bogden, United States Attorney, and Sharon		
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	Lahey, Special Assistant United States Attorney, to request that this Court extend the time to respond		
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	to Plaintiff's Amended Motion for Remand, whi	ich was filed on July 13, 2015 by 30 days from August	

12, 2015 to September 14, 2015. This is Defendant's first request for an extension of time to respond

to Plaintiff's Motion. Counsel's colleague Marla Letellier contacted Plaintiff's counsel on August 10,

2015 and confirmed that Plaintiff does not oppose Defendant's motion. Defendants' current deadline

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is August 12, 2015.

1	The Commissioner regretfully makes this request because Counsel responsible for briefing	
2	this case is unexpectedly out of the office due to medical issues. It is unclear at this time how long	
3	Counsel will be out of the office. The Commissioner requests a thirty (30) day extension in order to	
4	accommodate the potential need to transfer this case to new counsel.	
5	Defendant therefore respectfully requests a thirty (30) day extension of time to respond to	
6	Plaintiff's motion, up to and including September 14, 2015.	
7	Dated: August 10, 2015.	
8	Respectfully submitted	
9	DANIEL G. BOGDEN	
10	United States Attorney	
11	/s/ Sharon Lahey SHARON LAHEY Special Assistant United States Attorney	
12	Special Assistant United States Attorney	
13	OF COUNSEL:	
14	DEBORAH STACHEL Acting Regional Chief Counsel	
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17	IT IS SO ORDERED:	
18	LINUTED STATES NA CHOTE A THE MAD SE	
19	UNITED STATES MAGISTRATE JUDGE	
20	August 14, 2015 DATED:	
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**CERTIFICATE OF SERVICE** I, Sharon Lahey, certify that the following individual(s) were served with a copy of the foregoing UNOPPOSED MOTION FOR EXTENSION OF TIME on the date, and via the method of service, identified below: CM/ECF: Marc V. Kalagian 211 E. Ocean Blvd., Suite 420 Long Beach, CA 90802 Email: marc.kalagian@rksslaw.com **Leonard Stone** 710 South 4th Street Las Vegas, NV 89101 Email: <u>lstone@shookandstone.com</u> Dated this 10th day of August, 2015 /s/ Sharon Lahey **SHARON LAHEY Assistant United States Attorney**